Appendix C: Comparison of Plaintiffs' RICO Allegations Asserted in the Fourth Amended Complaint and RICO Allegations Asserted in *Laydon* Action

Appendix C: Comparison of Plaintiffs' RICO Allegations Asserted in the Fourth Amended

Complaint and RICO Allegations Asserted in Laydon Action

Laydon Proposed Third Amended Complaint ¹	Sullivan Fourth Amended Complaint ²
Defendants completed all elements of wire fraud	Defendants completed all elements of wire
within the United States or while crossing United	fraud within the United States or while crossing
States borders. Defendants did so by:	United States borders. Defendants did so by:
(i) transmitting or causing to be transmitted false	(i) transmitting or causing to be transmitted
and artificial Yen-LIBOR and/or Euroyen	false and artificial Euribor quotes in the
TIBOR quotes in the U.S. or while crossing	U.S. or while crossing U.S. borders through
U.S. borders through electronic servers located	electronic servers located in the United
in the United States;	States;
(ii) transmitting or causing to be transmitted false	(ii) transmitting or causing to be transmitted
and artificial Yen-LIBOR and/or Euroyen	false and artificial Euribor quotes that were
TIBOR quotes that were relied on by Thomson	relied on by Thomson Reuters and the EBF
Reuters and the BBA and/or JBA in collecting,	in collecting, calculating, publishing and/or
calculating, publishing and/or disseminating	disseminating the daily Euribor submissions
the daily Yen-LIBOR and/or Euroyen TIBOR	of each Defendant and the daily Euribor fix
submissions of each Defendant and the daily	that was transmitted, published and
Yen-LIBOR and/or Euroyen TIBOR fix that	disseminated in the United States or while
was transmitted, published and disseminated in	crossing U.S. borders through electronic
the United States or while crossing U.S.	servers located in the United States;
borders through electronic servers located in	
the United States;	
(iii) coordinating their daily Yen-LIBOR and/or	(iii) coordinating their daily Euribor
Euroyen TIBOR submissions and their	submissions and their Euribor-based
Euroyen-based derivatives trading positions in	derivatives trading positions in electronic
electronic chats routed through electronic	chats routed through electronic servers
servers located in the United States;	located in the United States;
(iv) sending trade confirmations based on	(iv) sending trade confirmations based on
manipulated Yen-LIBOR and/or Euroyen	manipulated Euribor rates to counterparties
TIBOR rates to counterparties in the United	in the United States.
States.	

¹ Laydon Proposed Third Amended Complaint ¶ 764, No. 12-cv-03419, Dkt. No. 302-2 and 302-3.

² FAC ¶ 482.